

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION V

**DATE:** November 12, 2003

**FROM:** Michael Chrystof

**TO:** Karen Mason-Smith, Ft. Dearborn RPM

**SUBJECT:** US-EPA Response to Comments on Data Validation Report (dated August, 2003) for Construction Completion Report for Various Site Remediations, Ft. Dearborn, Chicago, Ill.



Please find attached US-EPA Comments.

Attachment

**US-EPA COMMENTS ON DATA VALIDATION REPORT (AUG. 2003) FOR  
CONSTRUCTION COMPLETION REPORT  
FOR VARIOUS SITE REMEDIATIONS  
FT. DEARBORN, IL**

**COMMENTS:**

**Data Validation Report Main Body:**

1. **Section 4.7 Data Review Comments/Surrogate Recovery Limits Sub-Sections:** There is a minor typo in several of these sub-sections, stating that "The total number of samples analyzed was twenty-seventy". Please correct. **ARMY Response:** The typo has been corrected in several of the subsections. **US-EPA Response: Concur.**

**Attachment 2 - Checklists:**

2. **PCB Checklists:** For all PCB checklists, there is an "N/A" (not applicable) notification for Item 4d (pertains to Retention Time Window specs).. Looking back at the Sample Analysis Subsection for PCBs (see p.25), text notes that the RRT were within control limits. Please explain. **ARMY Response:** The checklists have the N/A as the specific samples did not have detects for PCBs. However, the RRT were within control limits for the standards, therefore it was stated that the RRT were within control limits. **US-EPA Response: Understood.**
3. **Glycol Checklists:** For the Glycol checklists, there is an "N/A" (not applicable) notification for Item 4d (pertains to Retention Time Window specs).. Looking back at the Sample Analysis Subsection for Glycol (see p.26), text notes that the RRT were within control limits. Please explain. **ARMY Response:** The checklists have the N/A as the specific samples did not have detects for Glycol. However, the RRT were within control limits for the standards, therefore it was stated that the RRT were within control limits. **US-EPA Response: Understood.**

**Attachment 5 - Chain of Custodies:**

4. **Cooler Receipt Report/ADRL #301101/Cooler #N011:** Report indicates that there was no Custody Seal date or name, and states "No" to Item 5: "Were custody papers sealed in a plastic bag, and taped inside to the lid?". If this is a typo, please correct. If not, this practice should be revised for future sampling efforts so that the seals are dated and named, and that the C.O.C. form is included in the cooler as required by Item 5. **ARMY Response:** The custody papers were provided in a sealed plastic bag in

each cooler; however, it is not clear if they were properly taped to the cooler lid. Extra care will be taken for future sampling so that the custody papers are taped to the top of the cooler, and that the custody seals are named and dated. **US-EPA Response: Concur.**

5. **Cooler Receipt Report/ADRL #301103/Cooler #N004:** Report indicates that there was only one custody seal on the cooler. Aren't two seals normally utilized? Please explain. It would also be helpful if the signature/name on the seal(s) was more legible to the sample custodian, as several sample receipt forms noted that the seal name could not be read. **ARMY Response:** One custody seal was present and intact at time of receipt at the laboratory, so that sample integrity was preserved. It is not clear if the second seal was not applied, or was dislodged during shipping. Extra care will be taken for future sampling so that two custody seals are affixed to each cooler, and that the custody seal(s) signature/names are more legible. **US-EPA Response: Concur.**

#### **Attachment 6 - Data Qualifiers:**

6. **Semivolatile Tables:** It was noted that the values reported out as "U" were slightly higher than the RL list in the QAPP. There is not an indication in the tables here, but did these samples require an adjustment that thereby raised the reporting limit? **ARMY Response:** The raised reporting limits were based upon the percent moisture in the sample; QAPP soil RLs are expressed as dry weight reporting limits based upon laboratory studies, and are to be adjusted for moisture content in soils.. **US-EPA Response: Concur.**